

Joseph & Norinsberg LLC

Fighting for Employee Justice



Queens Office

69-06 Grand Avenue, 3rd Floor
Maspeth, New York 11378

Manhattan Office

110 East 59th Street, Suite 2300
New York, New York 10022

Newark Office

One Gateway Center, Suite 2600
Newark, New Jersey 07102

Philadelphia Office

1515 Market Street, Suite 1200
Philadelphia, Pennsylvania 19102

Boston Office

225 Franklin Street, 26th Floor
Boston, Massachusetts 02110

Orlando Office

300 N. New York Ave, Suite 832
Winter Park, Florida 32790

Jon L. Norinsberg, Esq.
jon@norinsberglaw.com

November 18, 2024

VIA ECF

Hon. Sarah Netburn
United States Magistrate Judge
Southern District of New York
United States Courthouse
40 Foley Square, Room 219
New York, N.Y. 10007

**Re: Michael Saunders v. Royal Leaf Club Dispensary Corp.
Case No. 1:24-cv-06208 (JMF)(SN)
Proof of Service Upon Defendant**

Dear Judge Netburn:

We represent Plaintiff Michael Saunders in the above-referenced Americans with Disabilities Act (“ADA”) matter. Pursuant to the Court's Order, dated October 21, 2024, we write now to respectfully provide the Court with evidence demonstrating proof of service upon the defendant, and to provide an update on the status of the case.

By way of background, Plaintiff initiated this action by filing a Complaint on August 16, 2024. (Dkt. No. 1). On August 30, 2024, Defendant was duly served with the Summons and Complaint, along with relevant Exhibits, in accordance with Rule 4(c) of the Federal Rules of Civil Procedure and pursuant to New York Limited Liability Company Law §303. (Dkt. No. 8) To date, Defendant has failed to appear, answer, or otherwise respond to the Complaint, and has failed to reach out to Plaintiff's counsel.

Plaintiff has attempted alternative service upon defendant via email to no avail. We assure the Court that we are prepared to comply with all deadlines and procedures. Specifically, we will initiate the process to file the motion for Default Judgment against the Defendant on or before November 21, 2024.

We respectfully request that the Court not dismiss this case and allow us the opportunity to proceed with the prosecution of this matter.

Thank you for your understanding and consideration.

Respectfully submitted,

JOSEPH & NORINSBERG, LLC

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jon L. Norinsberg', with a stylized flourish extending to the right.

Jon L. Norinsberg, Esq.
Bennitta L. Joseph, Esq.
Attorneys For Plaintiff
110 East 59th Street,
Suite 2300
N.Y., N.Y. 10022
(212) 227-5700
Fax No. (212) 656-1889
jon@norinsberglaw.com
bennitta@employeejustice.com